

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**BRIAN KELSEY
JOSHUA SMITH**

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**CASE NO. 3:21-cr-00264
CHIEF JUDGE CRENSHAW**

JOINT MOTION TO EXTEND THE EXPERT DISCLOSURE DEADLINE

Come now Brian Kelsey and Joshua Smith, by and through counsel of record, and hereby respectfully move this Honorable Court to extend the expert disclosure deadline. The present deadline is Friday, May 20, 2022. The defendants are requesting a thirty-two (32) day extension of time to file their expert disclosures.

Counsel for defendant Brian Kelsey inquired from the government as to its position regarding this request and offered the same extension to the government (subject to the Court's approval). The government does not oppose this motion, and the government asks for the same deadline extension.

As grounds for this motion, counsel for Mr. Kelsey would state and show that they identified three experts they wanted to consult and/or retain as a trial witness. One of the potential experts passed away this past weekend. Counsel for Mr. Kelsey has decided not to use one of the potential experts. The third potential expert needs a little time to review the matter with his firm before deciding whether to engage, in accordance with his firm's protocol. The parties need additional time to secure their experts.

Mr. Kelsey, Mr. Smith, and the government are requesting to have an additional thirty-two (32) days (until June 21, 2022) to file their expert disclosures.

Respectfully submitted,

s/ **Paul Bruno**

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Joint Motion To Extend The Expert Disclosure Deadline* has been electronically delivered to Amanda Klopff, Assistant United States Attorney, 110 Ninth Avenue, South, Suite A961, Nashville, TN 37203-3870; David Pritchard, Assistant United States Attorney, 167 North Main Street, Suite 800, Memphis, TN 38103; and John P. Taddei, U.S. Department of Justice, 1301 New York Ave. NW, Washington, DC 20530; this the 19th day of May, 2022.

s/ **Paul Bruno**

Paul Bruno